

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

TOMAS SUXSTORF, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES, LLC,

Defendant.

Case No.: 2:21-cv-1024

Hon. Stephen C. Dries

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**PLAINTIFF'S MOTION TO REMAND TO MILWAUKEE COUNTY CIRCUIT COURT  
AND AWARD COSTS PURSUANT TO 28 U.S.C. § 1447(c)**

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Plaintiff Tomas Suxstorf, through counsel, respectfully requests that this Court enter an Order remanding this matter to Milwaukee County Circuit Court pursuant to 28 U.S.C.

§ 1447(c). The grounds for this motion are set forth in the accompanying memorandum of law.

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated, respectfully requests that this Court: (1) remand the case to Milwaukee County Circuit Court, (2) award Plaintiff the attorney fees incurred as a result of Defendant's improper removal, and (3) grant such further relief as the Court deems just and equitable.

Respectfully submitted,

Dated: September 14, 2021

**ADEMI LLP**

By: /s/ Ben J. Slatky  
Ben J. Slatky  
3620 East Layton Avenue  
Cudahy, WI 53110  
Phone No.: 414.482.8000  
Fax No.: 414.482.8001  
E-mail: bslatky@ademilaw.com